

## **EXHIBIT 2**

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA )  
BRYSON, as Administrators of )  
the Estate of C.Z.B., and )  
as surviving parents of )  
C.Z.B., a deceased minor, )

Plaintiffs, )

vs. )

ROUGH COUNTRY, LLC, )

Defendant. )

CIVIL ACTION FILE

NO. 2:22-cv-17-RWS

VIDEOTAPED DEPOSITION OF  
WESLEY D. GRIMES  
May 9, 2024  
10:17 a.m.

Weinberg Wheeler Hudgins Gunn & Dial  
3344 Peachtree Road, NE  
Suite 2400

Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

1           A. So this is -- it's showing 50 miles an hour  
2           at times zero. So times zero in this case is  
3           basically algorithm enabled, but it could have  
4           occurred shortly after this. Okay? We don't know  
5           exactly when it occurred.

6           So back to Exhibit 69, what -- what we're  
7           doing here is taking the absolute extreme and saying,  
8           well, could there be a little bit more braking during  
9           that time? And that gives us the absolute low end  
10          here of the 43.9 and then assuming the high end would  
11          be, what, 55.6, I think.

12          Q. And that's the low and high end of the speed  
13          of the F-250 at the time of impact?

14          A. Yes. Assuming those types of things, which  
15          I don't believe are true. I don't think there was  
16          significant braking effort, but this was the extreme  
17          that we did early on to get a feel for all the  
18          numbers that we were dealing with.

19          Q. So the braking we're talking about is that  
20          the CDR indicates that Mr. Elliott applied his brakes  
21          sometime in the last .5 seconds before impact; is  
22          that correct?

23          A. Yes.

24          Q. And --

25          A. And we don't know -- I'm sorry. We don't

1 correction for ABS braking?

2 A. Yeah. Isn't that what we're talking about?

3 Q. I was asking about the second row.

4 A. I apologize.

5 Q. So correction for braking and it says

6 .5 seconds next to time --

7 A. Yes.

8 Q. -- is that correct?

9 A. Yes.

10 Q. And it says .7 next to braking, parenthesis,

11 G. What is that?

12 A. Deceleration rate. An estimated

13 deceleration rate.

14 I apologize. I misunderstood your question.

15 Q. So that estimates that given a half second  
16 of braking and .7 Gs of braking, the speed would have  
17 been reduced by 7.7 miles per hour; is that right?

18 A. It could have been at the maximum. Yes,  
19 sir.

20 Q. And that reduction of speed wasn't applied  
21 to the crash test; is that correct?

22 A. It was not. No.

23 Q. And the crash test, there was no braking  
24 applied to that 250, right?

25 A. After the crash there was, it was not

1 before. We have to stop the vehicle after the crash.

2 Q. Understood.

3 A. But not before impact. There was no braking  
4 before impact.

5 Q. There was no braking before the F-250 hit  
6 the Escape in the crash test, correct?

7 A. That's correct.

8 Q. And then after the crash test, the brakes  
9 were applied remotely just to stop the F-250 from  
10 continuing to run away down the track, right?

11 A. Yes.

12 Are we done this?

13 Q. I'm figuring that out.

14 A. Okay. I'm not hurrying you.

15 Q. I wanted to ask you about page 1.

16 A. Okay.

17 Q. What is -- is this a calculation done for  
18 the crash test?

19 A. No. This was early on in our analysis of  
20 getting all the information together. So you can see  
21 where at that point I was estimating the vehicle, the  
22 pickup at 8800 pounds, the Escape at 3900 pounds, the  
23 51 miles per hour.

24 And what you can do is calculate the speed  
25 change shown. And you're seeing that here it's

1 the crash test?

2 A. No.

3 Q. And who else was there?

4 A. All of the Exponent staff and an attorney  
5 from Mr. Hill's office.

6 Q. Was Dr. Nguyen there?

7 A. Oh, yes, yes. Thank you. She was.

8 Q. How many Exponent staff were present  
9 approximately?

10 A. I don't know. Five or six. You know, I'm  
11 running cameras and setting up things. There may  
12 have been 10. I don't know.

13 Q. Did you make any changes to the crash test  
14 setup on the day of the test?

15 A. No.

16 Q. Was the purpose of the crash test to  
17 recreate the subject collision if the F-250 had not  
18 been lifted?

19 A. It wasn't really to recreate it. It was to  
20 explore what type of intrusion would occur without  
21 the lift kit on the vehicle. We're not trying to  
22 recreate it because we don't have cargo in the back.

23 Q. The purpose of it was to isolate how  
24 different the intrusion would be had the F-250 not  
25 been lifted; is that fair?

1           A. That was one goal, yeah. And for me, that  
2           was the primary goal was to -- to look at if we make  
3           the test as simple as we can with a nonlifted  
4           vehicle, but we want to match as closely as we  
5           reasonably can the speeds, the weights, the offset,  
6           the angles; things like that. We want to match all  
7           of that as much as we can.

8           But we don't have cargo in the vehicle, so  
9           I'm not going to say we're trying to recreate the  
10          crash. We're looking at what type of intrusion is  
11          going to happen without a lift kit on the pickup  
12          truck.

13          Q. Why do you want to match the speeds, weight,  
14          offsets and angles?

15          A. So that we can -- I can come to the  
16          conclusion that the lifted -- the lift kit on the  
17          pickup didn't affect significantly the amount of  
18          intrusion that would have occurred.

19          Q. If the speeds, weights, offsets and angles  
20          weren't matched, are you saying that you wouldn't be  
21          comfortable coming to that conclusion?

22          MR. HILL: Object to form.

23          THE WITNESS: I think there's a range  
24          for all of those things and we want to be  
25          within that range.

1 BY MR. MASHMAN:

2 Q. But the goal of matching is so that you can  
3 reasonably say as a scientific principle that the  
4 difference in height is what resulted in the  
5 difference of intrusion; is that fair?

6 MR. HILL: Object to form.

7 THE WITNESS: Or didn't. Yeah, yeah.

8 We want to be able to draw conclusions.

9 BY MR. MASHMAN:

10 Q. And the way to do that is to isolate the  
11 variable that you're changing; is that fair?

12 A. Well, we're -- the way to do it for what we  
13 did is to run the simplest test we could for a pickup  
14 to match the key components of the crash without a  
15 lifted truck.

16 Q. Why didn't you run a second crash test with  
17 all of the cargo directly behind Cohan as a worst  
18 case scenario to see how it affected the intrusion?

19 A. Because we didn't know exactly where the  
20 cargo was and I didn't to subject myself to the  
21 criticism of you had the bag of clothing in the wrong  
22 place or you had the Shop-Vac in the wrong place or  
23 whatever.

24 And really more importantly is Dr. Nguyen  
25 looked at the actual vehicle and said it was



1 didn't need it that really drove that -- that  
2 decision.

3 Q. Did anyone ever suggest putting an adult  
4 crash test dummy in the front driver's seat?

5 A. Not that I recall.

6 Q. Can you -- I apologize.

7 How did you select the vehicles used in the  
8 crash test?

9 A. Charlie Crosby and Exponent located those  
10 vehicles and purchased them.

11 Q. Is it important to have vehicles with  
12 similar structural characteristics in a crash test?

13 MR. HILL: Object to form but go ahead.

14 THE WITNESS: Of the structures that  
15 we're interested in, sure.

16 BY MR. MASHMAN:

17 Q. Do you agree that vehicles with different  
18 structural characteristics could perform differently  
19 from the subject crash?

20 MR. HILL: Object to form.

21 THE WITNESS: I guess it would depend on  
22 what the structural difference is. If it's  
23 something that's away from the crash zone,  
24 it doesn't have significant effect on the  
25 overall structure, then it wouldn't matter.

1       those vehicles, made that decision. I'm sure that  
2       he -- he told me which vehicles he was looking at and  
3       I approved them. I don't remember specifically doing  
4       that.

5               Q. Do you agree that the Escape used in the  
6       crash test did not have a sunroof?

7               A. Yes.

8               Q. Did you do anything to determine what effect  
9       the sunroof has on the strength of the Escape's  
10      structure?

11              A. No.

12              Q. I want to ask you about how the vehicles  
13      were set up for the crash test.

14              A. Okay.

15              MR. MASHMAN: I'm going to show you  
16      Plaintiff's Exhibit 74, which is a series of  
17      photographs from the crash test set-up.

18              (Pplaintiff's Exhibit 74 was marked for  
19      identification.)

20              MR. MASHMAN: Sorry, Rick. I don't have  
21      another copy of this one, but it's in his  
22      file.

23              MR. HILL: That's all right.

24      BY MR. MASHMAN:

25              Q. These pictures show how the vehicles were

1 Q. Okay.

2 A. I think that there were a lot of little  
3 marks that were looking at trying to associate  
4 between the two.

5 Q. Sitting here today, you don't recall any  
6 other match points that you relied on in aligning the  
7 two point clouds in the subject collision; is that  
8 fair?

9 A. That's fair.

10 Q. Did you rely on anything else to come up  
11 with the 10.9 inches of lateral offset?

12 A. No.

13 Q. Why did you decide to set up the crash test  
14 with the same amount of offset as there was in the  
15 subject collision?

16 A. Because we're exploring the intrusion into  
17 the rear occupant compartment.

18 Q. Could the amount of offset potentially  
19 impact the characteristics of the collision?

20 A. Sure. I don't think little changes. I  
21 think like Mr. Buchner says it's about 12 inches.  
22 I'm not going to argue about an inch.

23 You know, I think five or six inches,  
24 eight inches, yeah, that could make a difference, but  
25 I think half an inch, an inch, I'm not going to argue

1 about that.

2 Q. Do you agree the more offset there is in a  
3 crash, the more likely intrusion into the occupant  
4 compartment is?

5 MR. HILL: Object to the form. Go  
6 ahead.

7 THE WITNESS: Within a certain reason,  
8 that's probably fair. I mean, you know, if  
9 you -- if you -- again, if you go to an  
10 extreme, you're going to generate more  
11 intrusion.

12 BY MR. MASHMAN:

13 Q. What I'm trying to get at, all things being  
14 equal, more offset would mean more intrusion.

15 Is that the right relationship?

16 MR. HILL: Object to the form. Go  
17 ahead.

18 THE WITNESS: Again, within a range, I  
19 don't know -- within a short range, I don't  
20 think it's going to matter significantly.  
21 But a large range. I think that's probably  
22 true.

23 BY MR. MASHMAN:

24 Q. Do I have the directions right? It's not  
25 the opposite of what I said, right, that more offset

1 means less intrusion?

2 A. Again, that's probably true. I mean, I'd  
3 have to look at it and research but, in general, I  
4 think that that's probably true.

5 Q. I found a statement on IIHS website that in  
6 an offset crash --

7 THE REPORTER: What's the website? I'm  
8 sorry.

9 MR. MASHMAN: IIHS.

10 THE REPORTER: Thank you.

11 THE WITNESS: Institute -- Insurance  
12 Institute for Highway Safety.

13 BY MR. MASHMAN:

14 Q. In the statement I found was that in an  
15 offset crash, quote, a smaller part of the structure  
16 has to manage the crash energy and intrusion into the  
17 occupant compartment is more likely.

18 Is that accurate and fair to your knowledge?

19 A. If that's what's on their website, that's  
20 what's on there. You know, I'm not going to dispute  
21 that. Okay?

22 Q. And do you agree with the IIHS that an  
23 offset test is more demanding of a vehicle structure  
24 than a full width test?

25 A. If you have a lot of offset versus a full

1 center line to center line, I think that's probably  
2 true.

3 Q. Do you still have the photos --

4 A. I do.

5 Q. -- from the crash test setup?

6 Looking at the photos 238 to 240. Just let  
7 me know when you're there.

8 A. 238?

9 Q. Yes, sir.

10 A. I'm at 238.

11 Q. This shows how the Escape was oriented  
12 10.9 inches to the right of the center line of the  
13 track; is that correct?

14 A. I think that that's correct.

15 Q. Is the Sharpie mark in photograph 238 the  
16 Escape's midpoint?

17 A. I don't know. I'm assuming it is, but I  
18 don't know. I'm not the one that made the mark.

19 Q. But that measurement is -- at least appears  
20 to indicate that this is how they lined up, that the  
21 Escape was 10.9 inches to the right of the track's  
22 center line, right?

23 A. Yes. That's what this implies.

24 Q. Go to page -- photos 243 to 245.

25 A. Okay.

1 Q. These show that the F-250 was set up with  
2 its center line directly above the center line of the  
3 track; is that correct?

4 A. Yes.

5 Q. So the way the crash test was set up --  
6 well, I think I asked that.

7 Was the intent of this test to keep the  
8 vehicles in this same alignment where the center line  
9 of the F-250 was at the center line of the track at  
10 the moment of impact and the Escape was offset  
11 10.9 inches to the right?

12 A. In general that would be the desire of this.  
13 That's why they released the vehicle right before  
14 impact.

15 Q. At one point in your report you mention that  
16 the front bumper of the F-250 and the rear bumper of  
17 the Escape were approximately aligned at impact.

18 Does that refer to being aligned in terms of  
19 height?

20 A. Yes, sir.

21 Q. I'm going to refer back to these photos.

22 A. To which photos? The test photos? Okay,  
23 yeah.

24 Q. Photograph 284.

25 A. Yes.

1 BY MR. MASHMAN:

2 Q. I want to ask you about the emergency brake  
3 we talked about a second ago.

4 Did you direct Exponent to engage the  
5 emergency brake of the Escape before the crash test?

6 A. Not specifically. I think that was a  
7 decision -- first of all, I don't know that it was on  
8 at the actual impact. It may have been on to make  
9 sure the vehicle didn't move before the test. I  
10 don't know. As I sit here, I don't know.

11 But it doesn't bother me because you then  
12 have an axle that's locked. That's not an issue for  
13 me because the vehicle was in gear.

14 Q. I think my -- my question was whether you  
15 directed Exponent to engage the emergency --

16 A. I did not.

17 Q. Were you aware that Exponent had pulled the  
18 emergency brake before the test?

19 A. You know, they may have told me that out  
20 there. I don't specifically recall being told that.

21 Q. Do you have any recollection of Exponent  
22 telling you why they did that?

23 A. No.

24 Q. The test Escape did not have any cargo in  
25 the cargo area during the crash test, correct?



1 A. Correct.

2 Q. Why not?

3 A. Because we didn't feel it was necessary to  
4 put that in for our purposes and we didn't know  
5 exactly where the cargo was -- was at the time of the  
6 crash.

7 Ms. Kelley and Mr. Bryson didn't recall  
8 either. And so instead of guessing at that, we  
9 wanted to understand what would happen without the  
10 cargo. We always knew that if we put cargo in,  
11 whatever displacement we had of the tailgate would be  
12 amplified if there were materials in there taking up  
13 that space.

14 So it was the simplest test we could run  
15 without -- without compromising those types of  
16 things.

17 Q. I think you said earlier you didn't want to  
18 guess where the cargo was located in the Escape; is  
19 that fair?

20 A. Yes.

21 Q. Why is it important not to guess where the  
22 cargo was located in the Escape?

23 A. Because if we had put the cargo in and we  
24 got whatever that result was, we could be subject to  
25 criticism for not knowing where it was and

1 purposefully placing it for some purp- -- some of our  
2 own purposes and we had no desire to do that.

3 Q. And that criticism would be that the cargo  
4 was in a different location than where it was in the  
5 subject wreck, right?

6 A. Yes.

7 Q. And isn't it true by not including any  
8 cargo, the cargo was not in the same location that it  
9 was in the subject wreck?

10 A. That's true. But it also then doesn't have  
11 an artificial effect on the seat back displacement.

12 MR. MASHMAN: I'm showing you  
13 Plaintiff's Exhibit -- I think that says  
14 75 -- yes. It's two pictures of the damage  
15 to the Escape after the crash test.

16 (Plaintiff's Exhibit 75 was marked for  
17 identification.)

18 BY MR. MASHMAN:

19 Q. The second picture might be a little better  
20 for this, picture 385. Do you see that?

21 A. Yes.

22 Q. Do you see a mark left by the Ford F-250's  
23 Ford emblem on the rear of the Escape?

24 A. No.

25 Q. I'm looking at this mark above where it

1 a 2016 F-250?

2 A. No.

3 Q. Did you perform any calculations to  
4 determine how much .5 seconds of braking lowered the  
5 front bumper of a 2016 F-250?

6 A. No.

7 MR. MASHMAN: I'm going to hand you  
8 three exhibits. These are Exhibits 76, 77  
9 and 78.

10 (Plaintiff's Exhibit 76, Exhibit 77 and  
11 Exhibit 78 were marked for identification.)

12 BY MR. MASHMAN:

13 Q. Here's 76. That's a figure from your  
14 report. 77 is a series of pictures of the Escape  
15 after the crash test. And 78 is a series of pictures  
16 of the subject Escape after the collision.

17 Do you agree that the second row seat Cohan  
18 was sitting in deformed farther forward in the  
19 subject collision than in the crash test?

20 A. It certainly appears to have. Yes.

21 Q. Did you quantify how much the second row  
22 seat deformed statically in the subject collision?

23 A. No.

24 Q. Did you take any measurements of how much  
25 the second row seat deformed statically in the

1 subject collision?

2 A. We have scans where we can pull measurements  
3 off of that, but we have not done that.

4 Q. Did you quantify how much the second row  
5 seat deformed statically in the crash test?

6 A. No.

7 Q. Did you quantify how much farther forward  
8 the subject Escape's seat back is deformed compared  
9 to the test Escape's seat back?

10 A. No.

11 Q. Did you measure the angle of either seat  
12 back?

13 A. No.

14 Q. Do you have your report in front of you?

15 A. Yes.

16 Are you done with these images or --

17 Q. I'd like to keep them --

18 A. Okay.

19 Q. On page 33 of your report --

20 (Discussion ensued off the record.)

21 THE WITNESS: Page 33?

22 MR. MASHMAN: Yes.

23 THE WITNESS: Okay.

24 BY MR. MASHMAN:

25 Q. You offer the opinion that the test Escape

1 would have sustained more seat deformation if it had  
2 been loaded with exemplar cargo; is that right?

3 A. Yes.

4 Q. What is the basis of your opinion that the  
5 difference between the second row seat deformation  
6 was due to the lack of cargo in the test Escape?

7 A. Because the rear hatch came forward and made  
8 contact with the seat back. And if there has been  
9 cargo there, it would have taken up that space and  
10 would have caused the seat back of the second seat in  
11 the Escape to have been displaced more forward.

12 Q. Did you base that conclusion on any testing?

13 A. The crash test.

14 Q. The crash -- I'm specifically talking about  
15 the conclusion that if cargo had been placed in the  
16 cargo area, the seat back would have deformed more  
17 than in the crash test.

18 A. There was not any additional testing for  
19 that, no.

20 Q. Did you perform any calculations to reach  
21 that conclusion?

22 A. No.

23 Q. Does your report cite any literature for  
24 that conclusion?

25 A. I don't think so.

1 Q. Did you perform any analysis to determine  
2 what the total volume is of the cargo that was in the  
3 subject Escape?

4 A. No.

5 Q. Did you perform any analysis to determine  
6 whether the cargo would have deformed before the  
7 second row seat deformed?

8 A. No. We didn't do a specific analysis for  
9 that.

10 Q. Did you analyze whether the Shop-Vac is  
11 stronger than the bolted down second row seat of the  
12 Bryson's SUV?

13 A. No.

14 Q. Did you analyze whether a bag of clothing is  
15 stronger than the second row of the Bryson's SUV?

16 A. We didn't, but it would depend upon how much  
17 it was compressed obviously.

18 Q. But you didn't analyze how much it was  
19 compressed relative to the strength --

20 A. We did not.

21 Q. Did you analyze whether the camping chairs  
22 were stronger than the second row of the Bryson's  
23 SUV?

24 A. We did not.

25 THE REPORTER: Slow down.

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1 BY MR. MASHMAN:

2 Q. I apologize.

3 Did you analyze whether the umbrella  
4 stroller was stronger than the second row of the  
5 Bryson's SUV?

6 A. We did not.

7 Q. And I think you mentioned this earlier.

8 Do you hold yourself out as an expert in  
9 seat back design?

10 A. No.

11 Q. Do you have any basis to offer an expert  
12 opinion on seat back design?

13 A. On seat back design? No.

14 Q. Isn't it true that seat backs have a frame  
15 around the outer edge and the inside of that frame is  
16 mostly filling?

17 A. I think in some cases there is a lot of  
18 filling. I think there's some substructures. You  
19 would have to deglove that seat. Again, I'm not an  
20 expert on seat backs.

21 Q. And did you de-trim the seat in either the  
22 subject wreck or the test Escape to determine the  
23 internal make-up of the seat?

24 A. No.

25 Q. Do you have an opinion about how much more

1 the second row seat in the test Escape would have  
2 been deformed if you had loaded the same cargo into  
3 it that was in the subject wreck?

4 A. No.

5 MR. MASHMAN: I'm going to show you  
6 Plaintiff's Exhibit 79.

7 (Plaintiff's Exhibit 79 was marked for  
8 identification.)

9 BY MR. MASHMAN:

10 Q. This is an interrogatory that the  
11 plaintiff's responded to in this case.

12 Did Rough Country provide this to you before  
13 the crash test?

14 A. I don't remember seeing this, but we may  
15 have seen it.

16 Q. Do you agree that this itemizes what was in  
17 the back seat of -- strike that.

18 Do you agree that this itemizes what was in  
19 the rear compartment of the Bryson's Escape?

20 A. That's what it says it does. Yes.

21 Q. Did you rely on this in any way when you  
22 decided on how to configure the crash test?

23 A. No. Because we weren't putting cargo back  
24 there.

25 Q. Do you agree that if you had made the



1 MR. MASHMAN: Okay. I'm showing you  
2 Plaintiff's Exhibit 80, which is a screen  
3 shot from the video of the crash test.

4 (Plaintiff's Exhibit 80 was marked for  
5 identification.)

6 BY MR. MASHMAN:

7 Q. It was taken shortly before impact.

8 Do you agree that the F-250's center line is  
9 not aligned with the center line of the track?

10 A. From this perspective, I would agree with  
11 that.

12 Q. Do you believe that the perspective is the  
13 only reason why the F-250 center line is not aligned  
14 to the center of the track?

15 A. I don't know. I haven't looked at it.

16 Q. But at least in this photo you agree that  
17 the F-250's center line is to the left of the center  
18 line of the track.

19 A. I think the tape that's on the center of the  
20 hood appears to be to the left. But the center of  
21 the bumper may still be because there's parallax  
22 issues.

23 Q. What is a parallax issue?

24 A. Distortion of the image because of  
25 photography and lenses where things don't line up the

1 way you think they do.

2 Q. Have you done any analysis to determine how  
3 far to the left of the center line of the track the  
4 center line of the F-250 was at the moment of impact?

5 A. No.

6 Q. Page 34 of your report --

7 A. Yes.

8 Q. -- describes how you determined the amount  
9 of static crush in the subject collision and in the  
10 crash test, right?

11 A. Yes.

12 Q. Can you -- I'm sorry. You've already  
13 explained your methodology for determining the amount  
14 of static crush in the subject collision, right?

15 A. Yes.

16 Q. And that was taking the point clouds and  
17 aligning them with -- I believe, it was the tow  
18 hooks, the C-Brackets and impacts on the hood; is  
19 that right?

20 A. Yes.

21 Q. Did you --

22 A. And just to be clear, also just general  
23 shape of the crush, it helps you align those things.

24 Q. And general shape?

25 A. Yeah.

1 defendant's second interrogatories; is that right?

2 A. Yes.

3 Q. I'll represent to you that that's the same  
4 interrogatories we were looking at earlier that shows  
5 what was in the trunk.

6 Does this show that you got that document on  
7 February 6, 2023?

8 A. Okay. I'll not dispute that.

9 Q. Does this show that the receipt date for  
10 that was February 6, 2023?

11 A. Yes.

12 Q. Did you prepare a budget in this case?

13 A. No.

14 Q. What is the basis of your opinion that the  
15 sunroof had no effect on the strength of the roof  
16 structure between the subject Escape and the test  
17 Escape?

18 A. Well, first of all, the sunroof would be  
19 forward some distance from where the crush is  
20 actually occurring. And second of all, I don't think  
21 that removing part of a structure is going to make it  
22 stronger.

23 Q. Did you compare the distance between where  
24 the sunroof is and where the crush occurred?

25 A. No.

1 Q. Did you review design drawings of the  
2 Escape's roof with or without a sunroof?

3 A. No.

4 Q. Did you review the orientation of where  
5 structural components in the roof are of the Ford  
6 Escape with or without a sunroof?

7 A. No.

8 Q. Did you review the effects that it has on  
9 strength based on testing that had been performed?

10 A. No.

11 Q. Did you review any literature on whether  
12 that sunroof would have an impact on the strength?

13 A. No.

14 Q. Did you perform any testing of the  
15 differences between the strength of an Escape with  
16 the sunroof versus without a sunroof?

17 A. No.

18 Q. Did you review any testing of the strength  
19 of different component materials such as the glass or  
20 the structures that make up the roof?

21 A. No.

22 MR. MASHMAN: Okay. I don't think I  
23 have any more questions for you. I  
24 appreciate your time.

25 MR. HILL: Thank you. No questions.

CERTIFICATE

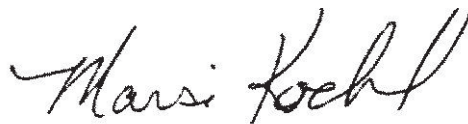
STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions, and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 5th day of June, 2024.



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Marsi Koehl, CCR-B-2424